

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TAL PROPERTIES OF POMONA, LLC,

Civil Action No.:

Plaintiff(s),

-against-

**RULE 11 STATEMENT**

VILLAGE OF POMONA, DORIS F. ULMAN, Individually  
and as Attorney for the Village of Pomona, BRETT  
YAGEL, Individually and as Mayor of the Village of  
Pomona, LEON HARRIS, Individually and as Deputy  
Mayor of the Village of Pomona, IAN BANKS, as Trustee  
of the Village of Pomona, ALMA SANDERS ROMAN, as  
Trustee of the Village of Pomona, NICHOLAS WILSON,  
as Trustee of the Village of Pomona, LOUIS ZUMMO, as  
Building Inspector of the Village of Pomona, and P.  
JOSEPH CORLESS,

Defendant(s).  
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**PLEASE TAKE NOTICE** that it is certified, to the best of my knowledge, information,  
and belief, that the within Notice of Removal is presented to the Court within the following  
parameters:


- (1) not for any improper purpose, such as to harass, cause unnecessary delay, or needlessly  
increase the cost of litigation;
- (2) the claims, defenses, and other legal contentions are warranted by existing law or by a  
nonfrivolous argument for extending, modifying, or reversing existing law or for establishing  
new law;
- (3) the factual contentions have evidentiary support or, if specifically so identified, will  
likely have evidentiary support after a reasonable opportunity for further investigation or  
discovery; and
- (4) the denials of factual contentions are warranted on the evidence or, if specifically so  
identified, are reasonably based on belief or a lack of information.

Dated: White Plains, New York  
April 21, 2017

Yours etc.,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

By:

  
Janine A. Mastellone  
John M. Flannery  
John B. Martin  
Attorneys for Defendants-Petitioners  
1133 Westchester Avenue  
White Plains, New York 10604  
(914) 323-7000

To: JOSEPH A. MARIA, P.C.  
Attorney for Plaintiff  
301 Old Tarrytown Road  
White Plains, NY 10603  
(914) 684-0333  
File No.: 08-0638